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Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352-0539

Dear Messrs. Alexander and Sherwood:

SUBMITTAL OF DOE/RL-90-22, REV. 0, "RCRA FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY WORK PLAN FOR THE 100-NR-1 OPERABLE UNIT, HANFORD SITE, RICHLAND, WASHINGTON," (ATTACHMENT 1), AND DOE/RL-91-46, REV. 0 "RCRA FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY WORK PLAN FOR THE 100-NR-2 OPERABLE UNIT, HANFORD SITE, RICHLAND, WASHINGTON," (ATTACHMENT 2) FOR RELEASE TO THE REGULATORS AND THE PUBLIC

Attached please find one set of the subject work plans for release to the State of Washington, Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the public. Drafts F and E, respectively were submitted to Ecology and EPA in 1994 and since no additional comments were received, the work plans are ready for public release, unrevised.

Work on the 100-NR-1 and 100-NR-2 Operable Unit Work Plans was initiated in FY 1989 and progressed through the sixth and fifth drafts, respectively, culminating with the current Revision 0 of each plan. The U.S. Department of Energy, Richland Operations Office (RL), Ecology, and EPA decided to manage and carry out all past-practice investigations under one characterization and remediation strategy, the Hanford Past-Practice Strategy (HPPS). The Resource Conservation Recovery Act of 1976 (RCRA) Facility Investigation/Corrective Measures Study (RFI/CMS) process under this strategy is a continuum of activities in which the effort is defined based upon knowledge gained as work progresses. The strategy is intended to reach early decisions to initiate and complete cleanup projects, maximizing the use of existing data, coupled with focused short-time frame investigations, where necessary. An important element of this strategy is the application of the observational approach, in which characterization data is collected concurrently with the cleanup.

In 1994, RL, Ecology, and EPA recognized the need to ensure consistent, effective, and nonduplicative cleanup in the N Area. The three parties agreed that sites associated with the Hanford Generating Plant (HGP) will be included in the 100-NR-1 Operable Unit. They also agreed to use the N Area as a Pilot Project that would integrate all aspects of deactivation, decontamination, and decommissioning, and remediation.

By agreement with Ecology and EPA, the RCRA Facility Investigations/Corrective Measures Studies (RFI/CMS) were initiated without formal release of the work plans. The RFI portions are essentially complete. Work on the CMS is underway to meet Milestones M-15-12B, submit Closure Plans/Corrective Measures Study (CMS) for 1301-N/1325-N to EPA/Ecology and M-15-12C, submit 100-NR-1 and 100-NR-2 CMS to EPA and Ecology. These documents are scheduled to be submitted on November 26, 1996. It is expected that shortly after the submittal of the CMS, Permit Modifications and Record of Decisions (RODs) will be issued, as appropriate, to initiate the cleanup of these two operable units.

The waste sites discussed in the 100-NR-1 work plan are described in terms of four basic groupings: treatment, storage, and disposal facilities (TSD), high priority sites, low priority or other sites, and HGP sites. The RFI status of each of these groups is discussed in the following:

- TSD facilities - There are four TSDs in the 100-N Area, 116-N-1 (1301-N effluent crib and trench), 116-N-3 (1325-N effluent crib and trench), 120-N-2 (1324-N surface impoundment), and 120-N-1 (1324-NA percolation Pond). Soil characterization of 116-N and 116-N-3 was conducted during a Limited Field Investigation (LFI) and was completed during FY 1996. Characterization of 120-N-1 and 120-N-2 was conducted during a LFI completed in FY 1993.

- High Priority sites - There are nine high priority sites identified by the three parties and discussed in the work plan. They are 118-N-1 (118-N spacer storage silos), 1304-N (emergency dump tank), 116-N-4 (1300-N emergency dump basin), 105-N (N Reactor spent fuel storage basin), UN-100-N-6 (decontamination waste drain line), 1322-N/NA (sample buildings), 116-N-2 (1310-N golf ball), 119-N (cooling water drain line), and 166-N (tank farm and diesel collection trench). Characterization of these sites was conducted in an LFI completed in FY 1993.

- Low Priority (other) sites - There are 42 low priority sites identified in the work plan and an additional 47 (including 10 HGP sites) which have been identified since then. No characterization was done for these 89 sites. It was decided that the CMS could be conducted based on existing information and process knowledge.

- HGP sites - The Washington Public Power Supply System (WPPSS) HGP RCRA Facility Assessment conducted by EPA in FY 1992 identified 13 waste sites. Ten of these sites have been added to the operable unit and are included above as low priority sites. Three of the sites were not considered to require remediation by the assessment and are not included.

In the 100-NR-2 work plan, an LFI was proposed to monitor the groundwater in the 100-N Area. One new monitoring well was established and existing wells in the area were used to form the monitoring network. This LFI was completed in FY 1993.

Currently, all of the RFI characterization activities for the 100-NR-1 and 100-NR-2 work plans are complete except for the completion and publication of the LFI Report on the 116-N-1 and -3 facilities. The field work is complete and the report is expected in FY 1996. An Expedited Response Action (ERA) was initiated in FY 1994 to reduce the flow of Strontium 90 that is entering the Columbia River at N-Springs. This ERA called for a Pump and Treat and a barrier wall to be installed. These actions are currently underway but are not directly a part of the work plan.

The two work plans describe the closure plan/CMS as consisting of five volumes: An executive summary, a 1301-N/1325-N volume, a High Priority Sites volume, a 1324-N/NA volume, a groundwater volume, and a Low Priority Sites volume. Current plans are to produce two CMS documents. The first document would include the groundwater and the High and Low Priority Sites (including the HGP sites). The four TSD facilities would be in the second document.

If you have any questions, please call me at 376-7326.

Sincerely,

David E. Olson

David E. Olson, Project Manager
N Area Project

NAP:DEO

Attachments: As stated

cc w/attachs:
P. S. Innis, EPA
R. L. Person, EM-442
P. R. Staats, Ecology

cc w/o attachs:
M. E. Greenidge, BHI
M. J. Lauterbach, BHI
E. F. Shorey, BHI